

Region 1 – Goal 4

EPA Region 1-State and Tribal Issues/Priorities for Goal 4 Healthy Communities

1. How the information was gathered: This information was gathered through multiple channels including: State and Regional staff meetings; PPA negotiations, discussions with the North East Waste Management Officials Organization (NEWMOA), and a direct solicitation to the State Planning/PPA Contacts. Also, over the last two years, Region 1 tribes have developed a regional tribal strategic plan, which was used along with review of more recent information that was gathered from the tribes by the Region 1 Tribal TOC representative.

2a. Description of key State issues:

4.1.1 Pesticide Program and 4.1.3 Toxics Programs

Issue - STAG funding for state pesticide and toxic programs have remained level funded at best and some program areas are experiencing reductions with increased program needs.

There are insufficient resources to manage the core state pesticides and toxics programs. State program resources for lead, asbestos and pesticides have been flat or on the decline over the past five years, yet annual state program costs (eg. salary, benefits, etc.) continue to rise. States are at risk for maintaining core infrastructure and activities across pesticide and toxics programs. It is virtually impossible to respond to the growing public concern and actual risks associated with asbestos in schools. Addressing this issue could require revision of Strategic Targets for 4.1.1 as well as additional language in the means and strategies section.

Issue - PART process excludes state involvement.

The PART process has been managed by EPA HQ and has not involved state programs but has tremendous impacts on resource decisions and new requirements. This is especially significant with regards to the development of new measures to gauge program effectiveness. States are concerned about the results of the PART process for pesticides and toxics programs and some would like to have the opportunity to provide input into these reviews. Greater alignment between PART measures and Strategic Targets (that are more heavily vetted with states) would be a good first step.

4.2.1 Smart Growth

Issue – States would like to get “credit” for smart growth practices.

States could benefit from a workplan modeled after HQ’s strategy to support practices to reduce environmental impacts of development. The use of smart growth techniques can help communities maintain pollutant loads established by

a TMDL, and minimize pollution impacts caused by development in a watershed; they also contribute to improving air quality by reducing automobile dependency and congestion, and in turn, ozone-forming emissions. States would like appropriate credit against EPA obligations, perhaps in SIPs and TMDLs. Addressing this issue could require revision of Strategic Targets for 4.2.1 as well as additional language in the means and strategies section.

4.2.2. Environmental Justice – no issues from the states

4.2.3 Brownfields - Continue review, award and management of assessment, cleanup, RLF and job training grants. Issue – States very supportive of program; some states concerned with sufficient, continued funding.

Integration of P2 into all goals - A key issue raised by the states' Pollution Prevention (P2) staff is the need to integrate P2 throughout all of EPA's programs, and not just have it be the responsibility of one or two offices. To accomplish this, we recommend that P2 be explicitly addressed as appropriate in each of the Strategic Plan Goals. In addition, or alternatively, P2 could be made a Cross-Goal Strategy. In either case, it is critical that pollution prevention become part of program offices' objectives and be realized through quantifiable targets as much as possible.

2b. Description of key Tribal issues:

Lead- Inspection, remediation, outreach and education.

Evaluate contaminant concentrations in natural resources used by the tribes for food, medicine, and spiritual purposes.

Baseline assessment of risks on tribal lands.

Addressing these issues could require revision of the strategic Targets and additional Tribal specific language in the “Means and Strategies” section for Goal 4.

Region 2 – Goal 4

Region 2 State and Tribal Input to EPA Strategic Plan

Goal 4

How information was gathered:

Region 2's Regional Administrator solicited comments from the State environmental commissioners in New Jersey, New York, Puerto Rico and the Virgin Islands and from the leaders of the seven federally recognized tribes in New York State. States and tribes were provided background information on EPA's revision of its Strategic Plan and were asked a series of questions designed to elicit comments, by goal, on their priorities, emerging issues, priorities that should be added or deleted from the Agency's plan, and any other advice they might have for the Goal Teams. Additionally, all of our staff that interact with their state/tribal counterparts (such as our Tribal coordinator, NEPPS and PPG coordinators, enforcement coordinators, etc.) were encouraged to solicit feedback regarding the Agency's strategic plan revision. We also committed to engage in an ongoing dialogue about priorities with our state and tribal partners, both as the Agency's strategic plan revision proceeds and when we revise our regional strategic plan next year. We received comments from the New York State Department of Environmental Conservation (NYSDEC), the Puerto Rico Environmental Quality Board (PREQB), the Virgin Islands Department of Planning and Natural Resources (VIDPNR) and the Haudenosaunee Environmental Task Force (HETF), representing the Onondaga Nation (the HETF comments were also endorsed by the Tuscarora Nation).

General Comments on EPA Strategic Plan:

NY stated that the current targets in the current EPA plan at least generally have quantifiable measures for performance that are associated with goals the public can understand. NY suggests that in light of increasingly tight funding, the priority for more cost effective investment in recognizing and providing incentives for sustainable businesses going beyond minimum compliance, pollution prevention and product stewardship should be part of retooling the base regulatory programs, not just an add-on with no funding (i.e. a separate Goal 5.) This is fundamental to the architecture of the 5 goals. The regulatory flexibility necessary to achieve these gains is not evident in the policies of OECA, EPA funding rules nor even the targets established for the media programs in the plan. Current incentives and self-audit policies are also weak, at best. Alignment across EPA offices to support strategic plan goals is critical, otherwise states perceive EPA as speaking with too many different voices on strategic priorities.

Regarding implementation of the strategic plan, NY states that while the states do the majority of work in implementing the goals of the plan, EPA funding to states continues to be cut or unavailable, for example water and wastewater

infrastructure, the Resource Conservation Challenge (RCC) initiative, pollution prevention. Fiscal realities undermine the credibility of the commitments made within the strategic plan. Unilateral rescission of grant funding to states, absent a dialogue, is not an approach consistent with the partnership commitments made in the plan.

NY states that EPA has not taken leadership on targets for which a federal lead is most critical because they affect national markets or global transport considerations (e.g. global warming, mercury, electronics waste). This further erodes the credibility of strategic commitments in the plan. These credibility issues ultimately affect the extent to which states will choose to comment on or participate in the strategic planning efforts. NY mentions concern regarding the unknown effects of nanotechnology product expansion in the environment (can affect several goals across media).

The HETF commented that the Strategic Plan should reflect Administrator Johnson's reaffirmation of government-to-government relationships with Nations in the agency Overview and throughout all Goals. Additionally, HETF suggested that EPA should recognize the jurisdiction and interests of the respective Indian Nations in aboriginal territory (i.e., land claim areas). Other comments from HETF are that tribal grants should limit the required matching funds and should provide flexibility to reallocate grant monies to better meet needs; EPA's budget solicitations should include Tribal Consortia (e.g., HETF); and there needs to be better turnaround time by EPA on award notice and money drawdown.

Data concerns arose such as PREQB's suggestion that EPA establish partnerships with local authorities to develop and distribute updated and comprehensive maps on all sources of water and environmental resources in Puerto Rico, for example: Groundwater wells, Surface Water Intakes, Fisheries and Threatened and Endangered Species by geographical area. (Note this is a national issue as GIS data acquisition is done centrally by the Agency).

Regarding energy, NYSDEC states that EPA's current five-goal architecture does not readily provide for energy considerations as a major goal. The quest for renewable energy resources under the Governor's Renewable Portfolio Standard, the expansion of the Green Building Tax Credit Program, the recognition of energy savings accomplishments in the New York Environmental Excellence Awards and Environmental Leaders programs, DEC's role in NYS energy planning and energy security are all priorities relevant to energy which have direct implications for resource consumption, pollution and homeland security. Notwithstanding scattered references to energy conservation, the energy issue has too many environmental implications to be largely deferred to other federal and state energy agencies. The Puerto Rico Environmental Quality Board also suggests that EPA address issues associated with investigating and developing new sources of energy. The Virgin Islands also comments that there is limited focus on energy. Energy conservation should be of higher priority.

The Virgin Islands DPNR finds EPA's current five-goal architecture adequate to capture priorities with the caveat that sufficient support is available on Caribbean issues. VIDPNR commented that global warming and energy conservation are its highest priority issues. Also, it is important to include the Virgin Islands in national programs such as EMAP and Global Change (where they currently are not reflected).

Comments Specific to Goal 4:

Pesticides research cited under Goal 4 should improve our understanding of impacts from aquatic herbicides on non-target species, a priority need in NYS.

Chronic Wasting Disease and other emerging pathogens in our wildlife, fish and shellfish populations (applicable to Goal 4 re: Healthy Ecosystems) also need to be considered.

NYSDEC comments that the recommendations of the Pew Commission Oceans study was an extensive multi-year effort that illustrates the crisis state of these resources and probably warrants its own Goal area. Absent this, the content of those recommendations should be reflected in an update to Goal 2 and Goal 4 (Healthy Ecosystems) targets and strategies.

The impacts of global environmental issues seem to be accelerating in the Virgin Islands. The global warming trend and the impacts of: African dust from the Sahara are of most concern. African dust contributes to health (respiratory) and coral reef decline in the Virgin Islands. Agricultural toxins are also traveling to the Territory with the dust. Other impacts from global warming include dieoffs of coral tissue from elevated sea temperature. Summer 2005 has seen massive coral bleaching events throughout the entire Virgin Islands. This may lead to massive mortality in the near future. There is also a more active hurricane season that is believed to be caused by global warming trends. The Virgin Islands has had many severe hurricanes over the years. Increasing activity and threats are very worrisome, as is the concern about sea level rise. Though none is observed at present, this would have severe impacts on the Virgin Islands coastal ecosystems.

Region 3 – Goal 4

Region 3, Goal 4: State Regional Issue/Priority Paper

1. Information Gathering: Region 3 hosted a multi-state conference call on September 13, 2005 to discuss overall priorities and met with each Region 3 division director. In addition, state issues and priorities were solicited during the year through bi-annual meetings with State Secretaries in the Fall and Spring and through EPA/state planning meetings. Information is gathered within the media specific programs in several different ways such as: 1) State Directors meetings 2) Monthly state programmatic calls 3) Performance Partnership Agreements/Grants, and 4) grant negotiations, mid and end-of-year reviews.

2. Description of Key State Issues/Priorities (Most prevalent among states):

- Chesapeake Bay: 1) reduce nutrient and sediment loads from agriculture practices, 2) reduce nutrient loads via upgraded wastewater treatment, and 3) watershed management in terms of development to reduce nutrient and sediment loads.
- Environmentally Responsible Development/ Sustainability: Utilize regulatory and financial assistance programs, as well as pilot projects and the EPA Smart Growth Network to integrate sustainable concepts into state programs.
- Multi-Media/ Holistic Approach: Collaborating on multi-media solutions to identified environmental problems
- Brownfields: One-Cleanup Program and non-traditional incentives in air, water, waste programs to encourage appropriate Brownfields redevelopment.
- Communities: special emphasis on low income and minority communities
- Public information /Environmental Indicators: Information to citizens to assist in making effective decisions and engage public through timely, accurate, accessible information, including environmental indicators.
- Wetlands: Protecting and enhancing wetlands: no net loss, voluntary wetland creation, wetland monitoring

Comments on Strategic Plan Architecture

- Move subobjective 4.2.3, Assess and Cleanup Brownfields, from Goal 4 to Goal 3 and have subobjective 3.2.2, Cleanup and Reuse Contaminated Land, with subobjective 4.2.3.
- Add growth issues including reforestation and environmentally responsible development, which is already in the plan, to Goals 3 and 4.
- Move objective 4.3- Ecosystems to Goal 2. Specifically move estuaries (4.3.1) and wetlands (4.3.2) to 2.2.1- Improve Water Quality on a Watershed Basis. These programs are vital to the restoration of watersheds and having them separate in the architecture does not

reinforce that idea. The subobjectives pertaining to Great Lakes (4.3.3), Chesapeake Bay (4.3.4), and Gulf of Mexico (4.3.5) could be moved to Goal 2 as their own separate subobjectives.

Region 4 – Goal 4

Region 4 Goal 4 State and Tribal Regional Issue/Priority Paper

How information was gathered

The Region sent a letter to the State Commissioners, Tribal Chiefs and Agricultural Secretaries requesting their input on the Strategic Plan and their program priorities. Additional discussions were held between our Region 4 programs and their State counterparts. We received input from the States of North Carolina, Georgia, Florida, Alabama, Kentucky and Tennessee.

Description of key state issues/priorities

Most of the States providing priorities under Goal 4 emphasized specific geographic priorities in their States and multi-media related issues. The architecture in the existing Strategic Plan is not adequate to address these issues. Although we have a goal title implying we are dealing with place-based issues in a multi-media way, we now have budget driven stove-pipe objectives and sub-objectives which are no different from the other goals. We suggest one way to deal with the types of issues our States are presenting would be to organize all the objectives and sub-objectives in Goal 4 by types of ecosystems with funding available from multiple NPMs for each objective. We will now present some examples of the types of issues/priorities we got from our States:

Restore Florida's Everglades

Protect Florida's Springs

Sustainable Sandhills Initiative (SSI) and Sustainable Environment for Quality of Life (SEQL)

Endangered Species Conservation Strategy

Southeast Regional Partnership for Planning and Sustainability (partnership between the Department of Defense, other Federal agencies, and the States of FL, GA, SC, and NC)

Albemarle-Pamlico National Estuary Program

Collaborate with the public health community to ensure that environmental quality is

protective of the health of all Georgians

Protect Georgia's ecosystems to sustain a variety of healthy habitats supporting a diverse

and productive mix of native species

Increase our understanding of the multi-pollutant and multi-media impacts sources have

on the environment. Expand the collection and reliance on real data to begin to fill

known data gaps and mitigate the uncertainties associated with cause and effect of

known environmental issues, such as mercury in fish and climate change.

Promote green and sustainable industries

Brownfields

Ambient Gamma monitoring and comprehensive biological monitoring at the DOE Oak Ridge Reservation

Increase public awareness of potential adverse effects of the introduction of chemicals

and pesticides into groundwater systems through karst features

Region 5 – Goal 4

**State and Tribal Regional Issues/Priorities
in regard to the
Revision of the U.S. EPA's 2006 – 2011 Strategic Plan**

**Region 5
Goals 1, 3, 4, and 5**

How information was gathered

Region 5 sought input from the states in the Region through a direct solicitation to the state members of the Region 5/State Planning Work Group and through program to program contacts between Region 5 program managers and their state counterparts. Region 5 sought input from the tribes in the Region through a direct solicitation to the environmental coordinators for each tribe and through discussion in the Regional Tribal Operations Committee.

Description of key state and tribal issues/priorities

None of the Region 5 states or tribes has, to date, identified any issues or priorities for the revision of the U.S. EPA's strategic plan for 2006 – 2011.

US EPA REGION 6 - - INPUT ON STATE/TRIBAL ISSUES/PRIORITIES

Goal 4: Healthy Communities and Ecosystems

1. How Information Was Gathered - Letters were sent to the Directors of R6 State Environmental Agencies requesting their review of the current EPA Strategic Plan and the identification of any new or emerging issues that <http://www.epa.gov/ocfo/plan/plan> are not adequately addressed in the current plan. The Director of the Office of Tribal Affairs contacted tribes to ask for the same input. The Tribes said that they did not feel that they were given adequate time to provide a meaningful response and declined to provide input. The Tribes have been assured that other opportunities will be available in the future for them to review drafts and provide input.
2. Description of Key State Issues/Priorities
 - a. Short description of the issues/priorities:
 - i. The application of legally applied chemicals to the ground, such as the application of pesticides to historically agricultural lands, has left a legacy of area-wide, non-point source pollution. Such issues are not amenable to resolution using the remediation-based responses that we use for other sources of chemicals of concern in the environment. EPA can assist states through the development of a non-remediation based, public awareness and regulatory strategy that would be effective in addressing such area-wide sources.
 - ii. TCEQ recommends that EPA consider adding a section in the “Cross-Goal Strategies” chapter regarding the. This would allow for reflection of the key components and goals of Border 2012 and similar border-related projects and agreements, including - for example - the social costs and benefits associated with EPA's border programs and the Border Environmental Infrastructure fund.
 - b. Potential impact to a specific Agency Program and its relevance to the national Strategic Plan. How might this issue/priority translate into a change in the architecture (objectives, sub-objectives, targets)? Means and strategies?
 - i. Regarding issue “2.a.i.” above, TCEQ's comment deals with legally applied pesticides, in which case, there are no known provisions under FIFRA that allow for a regulatory strategy to address the issue. If the issue deals with water impacts then a public awareness strategy could incorporate both the pesticides and water programs working together with the

agriculture community. A regulatory strategy, however, would constitute a greater scope effort but may be beyond the scope of FIFRA.

- ii. Regarding issue "2.a.ii." above, Region 6 agrees with the TCEQ recommendation that a section be added to the "Cross-Goal Strategies to address various bi-national and multi-media international border initiatives.

- c. Prevalence of the issue among the states and/or tribes in the Region - The issues outlined above were submitted only by the State of Texas.

REGION 7 STATE/TRIBAL INPUT TO EPA STRATEGIC PLAN

Goal #4.

Source of Input: Region 7 convenes a meeting of the state environmental directors twice yearly. The issue of joint planning & priority setting is always foremost on the agenda. In this way, every six months we verify the continuing validity of existing priorities and general environmental issues that were established in the development of the state PPA (All region 7 states have PPAs & PPGs with both state environmental and agriculture departments). These discussions are also held at the program level annually as regional and state program counterparts negotiate the work plans for PPGs and other discrete environmental grants.

Tribal priorities and concerns are also developed and verified on an ongoing basis. Senior management meets quarterly the ROC, and these meetings are supplemented by monthly conference calls in which all 7 tribes participate. Field visits by regional staff average at least one per month. Planning & priority setting are always part of the visits. In addition, four of the tribes have PPGs and these comprehensive work plan negotiations generate a plethora of information regarding crucial tribal issues.

Finally, on September 20, 2005 Region 7 convened a 90 minute conference call of the Regional Planning Council which included planning representatives of all the states & tribes to discuss specifically this OCFO exercise.

Overarching Concerns About EPA Plan: We began with general comments. IA opened with the comment that the EPA Strategic Plan, 2003-2008, is entirely too long. The others were in agreement that 239 pages is too much. It was proposed that if the current length is required to satisfy GPRA, the OMB and the Congress, then a shorter, more user friendly version might be developed for public consumption and broad management purposes. Most participants felt that the plan was not remotely strategic, but was a five year operating plan. NE commented that national priorities shouldn't drive regional priorities and cited as an example the absence of blue-green algae (which is a real priority for NE). Another was "small communities." It was observed that the language was present in the plan, but concrete action and projected results were absent. The plan needs to permit the flexible development of local strategies. While they agreed that this is technically possible, the reality seems to be overshadowed by the national emphasis. The general view was that we have what is allegedly a "bottoms up" process but a "top down" product. MO remarked that the measures were difficult to interpret. Do they represent targets that are aggregated nationally or one target to be met in each state?.

The Tribal rep. remarked that the environmental problems encountered by the tribes were not specifically reflected in the plan. However he said that the National Tribal Council (NTC) had no specific recommendations at the moment. It was merely an observation.

MO said that we desperately need a unified, simple reporting system so that what we're accomplishing gets recorded. The other states and the tribes heartily agreed. This point came up several times in slightly different contexts.

Several states noted that there are too many activity measures (more like an operating plan than a strategic plan). Need to have a few key measures and leave the nitty-gritty to the states. (This relates to the general comment regarding the length of the plan.)

In conclusion, there was a fairly unanimous opinion that the Plan had little relevance for the states & tribes. What counts is the money, and it is difficult to see a clear connection between the plan and the budget. The Agriculture interests in the region also feel that any strategies, but particularly those which feature "Stewardship" (which stresses individual responsibility) demand a greater stress on timely and relevant stakeholder communication regarding regulations and practices.

Specific to Goal 4: MO believes that Brownfields would be better suited to placement in Goal 3. A couple of states suggested moving P2 activities out of Goal 5 and placed in Goal 4. IA noted that "unsewered" communities received short shrift in the current plan, either in Goal 2 or Goal 4.

Region 8 – Goal 4

Goal 4: Healthy Communities and Ecosystems

Synthesis of State and Tribal Priorities and Issues --- U.S. EPA, Region 8

1. Information source: Information from states was solicited in a memo from Region 8's State Assistance Program to State Environmental Directors, State Planning Contacts, and State Agriculture Program Directors. Performance Partnership Agreements (PPAs) were also used to collect initial information on state priorities. Information from tribes was gathered at the Regional Operations Committee's (ROC) Quarterly Meeting.

2. Description of state and tribal issues and priorities:

Pesticide Harmonization. Every year new pesticides enter the marketplace, and old pesticides must be reassessed to meet modern standards. While governments rigorously assess each pesticide to ensure it meets current health standards, invariably there are different health and environmental standards as well different prices among different countries. This lack of harmonization affects all US growers, especially those in the northern tier states. Pesticide harmonization is not specifically mentioned in the Strategic Plan and should be discussed under Objective 4.1. Harmonization of data requirements and review, acceptance of international data, and activities related to international pesticide labeling may also be addressed under this objective.

Pesticides use in Indian country: On/Off-Indian Country agricultural pesticides activity is a significant issue for tribes in region 8, particularly related to pesticide drift, groundwater contamination, (Related to water quality goal) etc among others. It is also a priority to safeguard traditional food sources, medicinal plants, herbs; native grasses, by eliminating pesticide contaminants on tribal lands, which gains importance as tribes increasingly use holistic approaches to maintain cultural traditions and practices. This impacts 75-80% of tribes in Region 8. The introduction to Goal 4 could be expanded to address how pesticides may affect traditional tribal food sources, medicinal plants and other traditional practices.

Tribal Schools: Provide resources to tribes to assess safety in the environment of tribal schools and colleges and establish appropriate integrated pest management programs. This impacts 100% of tribes in Region 8. While this does not affect the architecture of the Strategic Plan, Sub-objective 4.2 could be expanded to address health in tribal schools.

Brownfields: Continue/increase funding for the Brownfields Tribal Response Program. After the clean-up, tribes would ensure that the land is restored to a usable condition with consideration to tribal cultural and traditional uses. The tribes' capability for working with solid and hazardous waste programs has been

improved through this program, but it only scratches the surface of the large volume of work that needs to be completed. The Brownfields language under Objective 4.2 could also include restoring sites in Indian Country for cultural and traditional uses, as well as increasing tribal capacity in this area. This impacts 50% of tribes in Region 8.

Protection of endangered species: The current trend to loosen threatened and endangered requirements especially in regard to oil and gas activity and surface water conditions is considered a threat to tribes' natural resources. There needs to be a commitment within the strategy to strengthen NEPA and the ESA, not erode it. While this priority is not intended to affect the strategic plan, it is important for goal teams to recognize this key tribal issue.

Funding for State Pesticide Programs: Because of the lack of funding to maintain the past level of oversight, we have had to resort to responding only to those pesticide complaints that have a written statement from the complainant. By doing this, it is possible that some pesticide misuse issues may go uninvestigated. We have also been unable to fill a vacant pesticide program position due to the lack of funding. Because of this, duties have been shifted to an already taxed staff. If funding levels are not increased, we won't be able to do all of the things we should. We understand that this is a pressing issue with all states and tribes within the region and across the country. While this may not affect Goal 4 of the Strategic Plan, it is important for the Goal Teams to recognize pesticide funding issues among state governments.

3. Other Cross-Goal Issues:

Building State Capacity: Reductions in federal funding for core programs that are occurring concurrently with increases in the workload required of these delegated programs by EPA, represents a major state issue. States and EPA need to work collaboratively to address federal funding shortfalls for the delivery of environmental programs at the state level. We need to make strides in eliminating duplication and inefficiencies by jointly defining the relative roles, responsibilities, authorities and resources of the state and EPA. This includes jointly and collaboratively redefining regional oversight to ensure that federally authorized programs are conducted adequately with authorization agreements in the most efficient manner.

Standardization of Media Program Databases: As states consolidate their databases into statewide, enterprise-based systems, it becomes more problematic to communicate with EPA's unique databases. Standardization of EPA's databases would facilitate a more fluid exchange of information and bring consistency to the data gathered among programs.

Region 9 – Goal 4

Goal 4 - Healthy Communities and Ecosystems

Overall Comments:

- o **It is critical that BAS/APGs/Organizational Assessment measures are aligned to minimize the reporting burden on regions/states/tribes/Pacific Islands and to ensure that we are measuring environmental results.**
- o **Tribes constitute a high priority in Region 9. Key activities to develop and enhance tribal capacity for this goal and the other four goals (including providing adequate assistance and funds for those tribes seeking program approvals, authorizations, delegations, or Tribal Standards) are included in Goal 5, Objective 3 *Build Tribal Capacity*.**

Text from current Agency Strategic Plan:

Protect, sustain, or restore the health of people, communities, and ecosystems using integrated and comprehensive approaches and partnerships.

Objective 4.1 Chemical, Organism, and Pesticide Risks

Prevent and reduce pesticide, chemical and genetically engineered biological organism risks to humans, communities, and ecosystems.

Subobjective 4.1.1

Through 2008, protect human health, communities, and ecosystems from pesticide use by reducing exposure to the pesticides posing the greatest risk.

New Input from Region 9, States/Tribes/Pacific Islands:

Priority: Minimize public health and environmental risk from pesticide, chemical, and genetically engineered biological organisms. Agricultural, consumer, structural pesticide use, and worker safety and lead abatement are key priorities throughout the Region. Disease vector risk should also be considered.

Impact: Probably would not require a change in the architecture.

Geographic scope: Arizona, California, Hawaii, Nevada, Tribes

Priority: Assess, monitor, and manage (tiered approach) pesticides of concern in 303(d) listed water bodies in Indian country.

Impact: Probably would require an additional measure/subobjective in the architecture.

Geographic scope: Tribes

Priority: Demonstrate marked improvement in protecting workers/applicators in Indian country.

Impact: Probably would require an additional measure/subobjective in the architecture.

Geographic scope: Tribes

Text from current Agency Strategic Plan:

Subobjective 4.1.3 Reduce Chemical and Biological Risks

Through 2008, prevent and reduce chemical and biological organism risks to humans, communities, and ecosystems.

New Input from Region 9, States/Tribes/Pacific Islands:

Priority: Address specific chemical/biological risks (lead, PCBs, asbestos, mercury from gold mining and hospitals, brominated flame retardants from electronics and furniture, dioxins, and PBT chemicals) throughout the Region. Develop a national mercury strategy to address, among other things, air deposition on impacted water bodies.

Impact: Could provide some adjustment in a measure/subobjective in the architecture.

Geographic scope: Arizona, California, Hawaii, Nevada, Tribes, Pacific Islands

Text from current Agency Strategic Plan:

Objective 4.2 Communities

Sustain, clean up, and restore communities and the ecological systems that support them.

Subobjective 4.2.2 Restore Community Health

Through 2008, facilitate the restoration of communities impacted by environmental problems. By 2008, increase by 50% the number of communities, working with EPA, that have addressed disproportionate environmental impacts and risks through comprehensive, integrated planning and environmental management, compared to the 2002 baseline of 30 communities.

New Input from Region 9, States/Tribes/Pacific Islands:

Priority: Address communities facing adverse disproportionate impacts, such as US/Mexico Border, Barrio Logan in San Diego, California; East Palo Alto, California; North Richmond, California; communities associated with the Los Angeles International Airport expansion; and Region 9 tribes. Target Agency enforcement, grant, partnerships, and other resources toward these communities.

Impact: Could require an adjustment to the strategic targets and measure/subobjective in the architecture.

Geographic scope: Region-wide, but with specific focus in populations or areas of adverse disproportionate impacts. Key principles are needed to address Environmental Justice to help guide the revision to the overall Agency Plan.

Priority: Improve overall environmental protection in the Pacific Islands by providing water infrastructure to access safe, reliable drinking water and address wastewater disposal needs, improving waste management, and building environmental protection capacity.

Impact: Might require some changes in measure/subobjective in the architecture to address alternative funding mechanisms in particular.

Geographic scope: Pacific Islands

Text from current Agency Strategic Plan:

Subobjective 4.2.3 Assess and Clean Up Brownfields

By 2008, provide funding to eligible grant recipients, and working with our state/tribal partners, assess and promote cleanup and reuse of 9,200 Brownfields properties, leveraging 33,700 jobs and \$10.2 billion in cleanup/development funding.

New Input from Region 9, States/Tribes/Pacific Islands:

Priority: Use RCRA and Superfund authorities to restore, cleanup and reuse contaminated communities throughout the Region, with focus on areas such as East Palo Alto (California); Gila River Indian Community; Los Angeles (California); Long Beach (California); Oakland (California); Richmond (California); San Francisco (California); and Hawthorne (Nevada).

Impact: Probably no changes in architecture required.

Geographic scope: California and Nevada

Text from current Agency Strategic Plan:

Subobjective 4.2.4 Sustain and Restore US-Mexico Border Ecosystems

In the US Mexico Border Region, sustain and restore community health and preserve the ecological systems that support them.

New Input from Region 9, States/Tribes/Pacific Islands:

Priority: Sustain and restore US/Mexico Border ecosystems and enhance collaborations with communities through implementation of Border 2012; improving water infrastructure and providing improved water quality conditions; and working toward a bi-national policy on land cleanup, reuse, and revitalization of abandoned sites.

Impact: Probably will not require an adjustment in the architecture, but may need to address alternative funding mechanisms.

Geographic scope: Arizona, California, Tribes

Text from current Strategic Plan:

Objective 4.3 Ecosystems

Subobjective 4.3.1 Protect and Restore Ecosystems

Facilitate the ecosystem-scale protection and restoration of natural areas.

New Input from Region 9, States/Tribes/Pacific Islands:

Priority: Facilitate the ecosystem-scale protection and restoration of natural areas with a focus on the San Francisco Bay, Santa Monica Bay, and Morro Bay in California and the coral reefs in the Pacific Ocean.

Impact: May require an additional measure/subobjective to cover unique needs of the coral reefs.

Geographic scope: Regionwide, but with particular focus in California, Hawaii, Pacific Islands.

Text from current Agency Strategic Plan:

Subobjective 4.3.2 Increase Wetlands

Achieve a net increase of 400,000 acres of wetlands with additional focus on biological and functional measures

New Input from Region 9 States/Tribes/Pacific Islands:

Priority: Achieve an increase in wetlands acres throughout the Region.

Impact: No change in the architecture is needed.

Geographic scope: Arizona, California, Hawaii, Nevada, Tribes

Priority: By 2011, no net loss of wetlands acres in Indian country.

Impact: May require an additional measure/subobjective in the architecture.

Geographic scope: Tribes

Region 10 – Goal 4

State and Tribal Comments from R10 on Goal 4: Healthy Communities and Ecosystems

Elevation of Puget Sound in National Agenda: The Puget Sound Basin is one of the most ecologically diverse in North America, containing a wide range of internationally significant species and habitats. The diversity of habitats and high productivity associated with saltwater-freshwater mixing occurring across such a large protected water body creates exceptional biological diversity and productivity. Puget Sound merits national attention and protection similar to that granted to the Gulf of Mexico, Chesapeake Bay or the Great Lakes. Facing expanding population pressures, a complex mix of non-point and point pollution sources, multiple governmental and private jurisdictions, the Puget Sound ecosystem is emblematic of ecosystem concerns facing the United States and Canada.

Suggested modification to NSP: Create specific Puget Sound sub-objective in 4.3

Comment provided by: State of Washington

Revision of TSCA Implementation: The federal system of regulating chemicals is inadequate. Thousands of chemicals have not been adequately assessed for human health impacts. Many states are looking to regulate Persistent, Bioaccumulative and Toxic chemicals because the federal regulatory system has too many loopholes. EPA has no health data for 85% of the 18,000 chemicals introduced into use since the 1970's.

The Washington State Departments of Ecology and Health are currently involved in an initiative to reduce the impact of persistent, bioaccumulative toxics (PBTs) in the environment. As part of this initiative, Washington's agencies have developed a chemical action plan to address polybrominated diphenyl ether (PBDE) flame retardants. In assessing possible alternatives to the only PBDE flame retardant still in use, Deca-BDE, Ecology and Health determined that alternatives already in use have very limited data with which to confidently determine whether they are better than Deca-BDE. This lack of information on Deca-BDE alternatives, presumed by many users to be a better choice, highlights the need for better implementation of TSCA with respect to up-front data collection.

One valuable tool that EPA could employ to improve its ability to collect data under TSCA would be a requirement for environmental and biomonitoring of chemicals that meet a certain criteria of risk. Such criteria would be based on existing definitions of PBTs already in place. Any such new rule should specifically require biomonitoring of workers potentially exposed during manufacture/use of the chemical. The benefits of such a requirement under TSCA are illustrated by the recent example of perfluorooctanoic acid which was detected by the 3M Corporation in the blood of their workers causing an immediate response from the company. Any new rulemaking along this line

would need to require, if not already required under TSCA, that companies immediately provide these data to EPA.

Suggested modification to NSP: Modification of Goal 4, Objective 1: Chemical, Organic and Pesticide Risks. Create a better strategy for assessment on toxins, which includes environmental and worker biomonitoring under the Toxic Substances Control Act.

Comment provided by: State of Washington

Agriculture: Need greater focus on environmental issues of common concern to EPA, state environmental agencies, and state agriculture agencies. Senior managers from each of these agencies and Region 10 will meet twice a year, focusing on a single topic per meeting to discuss the problem, clarify roles and responsibilities, and identify new solutions. Topics identified so far include water quality and TMDL implementation, air quality and agricultural burning, and pesticides and legal issues with designation of waters of the US.

Suggested modification to NSP: National Strategic Plan should acknowledge that this is an emerging priority for Region 10.

Comment provided by: From the joint state-EPA work currently being funded by the ECOS grant. Partners consist of all four states in Region 10 and the EPA regional office.

Toxics in the Columbia River: We need greater focus and coordination on issues relating to toxics in the Columbia River. The joint workgroup will identify the major toxics problems and cleanup efforts to date in three major sections of the Columbia River. Partnerships between EPA, state, tribal and other agencies will be formed to identify and resolve major unaddressed toxics problems, and to establish specific environmental outcomes and goals for toxics reductions in fish, sediment and ambient water. Challenges to be overcome include effective strategies and implementation leadership for the major river segments, public outreach, and obtaining sufficient resources.

Suggested modification to NSP: National Strategic Plan should acknowledge that this is an emerging priority for Region 10.

Comment provided by: From the joint state-EPA work currently being funded by the ECOS grant. Partners consist of all four states and relevant Tribal leadership in Region 10 and the EPA regional office.

Energy Generation & Conservation: Need to lessen our reliance on petroleum and nuclear power sources. Need to promote energy conservation, wind turbine energy production, and alternative energy sources.

Suggested modification to NSP: Add this strategy to Goal 4.

Comment provided by: Traditional Village of Togiak

How Information Was Gathered: In July, information on this exercise was presented at the Regional Tribal Operations Committee Meeting. In August, the Acting Regional Administrator sent letters to all the Directors of the State Environmental Programs and all Tribal Leaders requesting input on EPA's National Strategic Plan. Additionally, Region 10 GAP-grant coordinators transmitted similar requests to their tribal contacts. In September, this exercise was discussed at the Pacific Northwest Directors meeting that includes all the Directors of the State Agencies, Region 10's Regional Administrator and Director of the environmental programs for the Province of British Columbia and representatives from Environment Canada.